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Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH
NORTHERN DIVISION**

**LELAND KIM MCCUBBIN, JR. and
DANIEL JOSEPH LUCERO,**

Plaintiffs,

vs.

**WEBER COUNTY and CHRISTOPHER
ALLRED, in his official capacity,**

Defendants.

**Supplement to Motion to Reopen
Discovery and Memorandum in
Support**

Consolidated Case Nos. 1:15-cv-132 &
1:15-cv-133 CW CMR

On October 16, 2019, Plaintiffs moved for a six-week period to reopen discovery (Doc. No. 201). Plaintiffs submit this brief supplement to make an additional request as part of that motion. Specifically, since the requested time to complete reopened discovery is six weeks, or 42 days, Plaintiffs ask that the Court require that Weber Defendants respond to any written discovery requests within 10 business days of being served them. This response period will allow Plaintiffs time to identify deponents and prepare for depositions. In contrast, if the period is granted and Defendants have the standard 30 days to respond to written discovery, it would give Plaintiffs less than two weeks to receive and review the responses and identify and prepare for depositions. Plaintiffs urgently seek to avoid further delay, and this proposal allows for an abbreviated

discovery period that includes time enough for both written discovery and depositions.

Plaintiffs corresponded with Defendants on February 27 and 28, 2020 to meet and confer regarding this request. As of the time of this filing, counsel for Defendants had not yet responded as to whether they would agree to this request.

Plaintiffs will send an updated proposed order to chambers via email that specifies this response time and that slightly clarifies the language of the proposed order on this motion they sent on October 16, 2019.

Dated: February 28, 2020

SIGNED

s/ John Mejia

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CERTIFICATE OF SERVICE

I certify that I served a copy of the foregoing brief to counsel for Weber Defendants via the Court's CM/ECF system.

s/John Mejia
February 28, 2020